components, namely (1) a resole resin, (2) a novolac resin, (3) a haloalkyl-substituted S-triazine and (4) an infrared absorber. As the Examiner has pointed out, Garth provides no disclosure of the use of two of the four essential ingredients, namely, the haloalkyl-substituted S-triazine and the infrared absorber.

Stahlhofen describes a composition containing:

(a) a 1,2-quinonediazide or a mixture of a compound that forms an acid on exposure and a compound having at least one C-O-C bond cleavable by acid,

(b) a water-insoluble binder,

(c) a photolytically cleavable organic halogen compound which can be a haloalkyl-substituted S-triazine and

(d) an azo dyestuff containing at least one nitro group.

Stahlhofen provides no disclosure of Applicants' use of a mixture of a resole resin and a novolac resin nor of Applicants' use of an infrared absorber. Thus, only one of Applicants' four ingredients, namely the haloalkyl-substituted S-triazine, is required in Stahlhofen's composition.

The Examiner points out that Stahlhofen teaches the equivalence as acid donors of haloalkyl-substituted S-triazines and naphthoquinone-diazidesulfonyl halides. Based on this teaching of equivalence, the Examiner concludes that it would be obvious to use the haloalkyl-substituted S-triazine of Stahlhofen in the formulation of Garth in place of the orthoquinone diazide utilized by Garth. However, the Examiner has overlooked the fact that Stahlhofen employs sulfonyl halides of naphthoquinonediazides whereas Garth does not employ his naphthoquinonediazide in the form of a sulfonyl halide. Stahlhofen requires that the compound be an organic halogen compound so that it will form a halogen acid. Garth does not require the formation of a halogen acid but, on the contrary, uses his naphthoquinonediazide to provide

sensitivity to light. Thus, Stahlhofen provides no conceivable basis on which one would be lead to replace the naphthoquinonediazide of Garth with a haloalkyl-substituted S-triazine. Note that Stahlhofen teaches the optional use of a 1,2-quinonediazide as the component (a) of his formulation which imparts the light sensitivity. Thus, he can use both a 1,2-quinonediazide and a naphthoquinonediazidosulfonyl halide in the same composition. He does not disclose any equivalence between his 1,2-quinonediazide and his haloalkyl-substituted S-triazine.

As the Examiner points out, Newman describes a photosensitive composition comprising a phenolic resin, an onium salt and a spectral sensitizer which can be a cyanine dye. However, he provides no disclosure of Applicants' use of a mixture of a resole resin and a novolac resin nor of Applicants' use of a haloalkyl-substituted S-triazine.

With regard to the materials used for preparation of resole resins and novolac resins, Applicants do not base their case for patentability on the use of particular starting materials but on the use of the products <u>in admixture</u> and together with the other necessary components of the novel four-component formulation. Paricularly good results in Applicants' novel four-component composition are achieved when the resole resin is derived from bis-phenol A and formaldehyde and the novolac resin is derived from m-cresol and formaldehyde. This is in no way disclosed or suggested by Newman.

Combining either or both of Stahlhofen and Newman with Garth can in no conceivable way suggest or render obvious Applicants' novel four-component composition. No reason exists to pick particular ingredients out of the formulation of Stahlhofen or the formulation of Newman and substitute them into the formulation of Garth. To combine references there must be appropriate motivation and none exists in this case. Moreover, it is not reasonable to arbitrarily pick and

choose portions of a reference such as Stahlhofen or Newman while ignoring the totality of its teachings.

None of the three references describes a composition that has the advantageous characteristics of Applicants' composition. Applicants' composition is useful to produce a printing plate which can be employed as either a positive-working plate or a negative-working plate. This is in no way the objective of Stahlhofen's invention. It is the objective of both Garth and Newman but in both instances the plates described require two exposure steps in order to be utilized as a negative-working plate, namely an imagewise exposure and a subsequent overall exposure. This serious disadvantage is completely avoided by Applicants' invention.

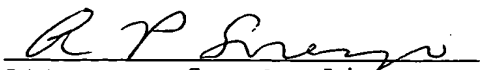
The attention of the Examiner is courteously directed to the disclosure from line 5, page 3 to line 29, page 5 of Applicants' specification which describes the deficiencies of both Garth and Newman and explains the advantages and benefits of the present invention.

The Examiner cites Buhr (U.S. 4,189,323) as prior art that is not relied upon but is considered pertinent to Applicants' disclosure. This reference describes the use of certain particular haloalkyl-substituted S-triazines as photoinitiators in radiation-sensitive compositions containing polymerizable ethylenically unsaturated compounds or compounds whose solubility is changed by the action of an acid. The mere teaching that haloalkyl-substituted S-triazines are effective photoinitiators provides no conceivable basis for rejecting Applicants' claims to a novel four-component composition that is highly advantageous in producing a lithographic printing plate that can be employed in either a positive-working or negative-working mode.

For all of the reasons given above, the claims of this application are believed to be patentably distinct from and allowable over the prior art and the application is believed to be in condition

for allowance. Reconsideration is respectfully requested and an early favorable action is earnestly solicited.

Respectfully submitted,



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